

1 Stacey M. Leyton (SBN 203827)  
2 Barbara J. Chisholm (SBN 224656)  
3 Danielle Leonard (SBN 218201)  
4 ALTSHULER BERZON LLP  
5 177 Post Street, Suite 300  
6 San Francisco, CA 94108  
7 Tel. (415) 421-7151  
8 Fax (415) 362-8064  
9 sleyton@altber.com  
10 dleonard@altber.com  
11 bchisholm@altber.com

12 Elena Goldstein (pro hac vice)  
13 Skye Perryman (pro hac vice)  
14 DEMOCRACY FORWARD FOUNDATION  
15 P.O. Box 34553  
16 Washington, DC 20043  
17 Tel: (202) 448-9090  
18 Fax: (202) 796-4426  
19 egoldstein@democracyforward.org  
20 sperryman@democracyforward.org

21 *Attorneys for Plaintiffs*

22 [Additional Counsel not listed]

23 UNITED STATES DISTRICT COURT  
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF  
27 GOVERNMENT EMPLOYEES, AFL-CIO, et  
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF MAJOR GENERAL  
(RET.) PAUL EATON, USA**

**DECLARATION OF MAJOR GENERAL (RET.) PAUL EATON, USA**

I, Major General (Ret.) Paul Eaton, USA, declare as follows:

1. I am Chairman of Vote Vets Action Fund, Inc. (VoteVets), a nonprofit (501(c)(4)) organization serving veterans nationwide. In my capacity as chairman, I provide strategic leadership by overseeing the board of directors, ensuring effective governance, and guiding the organization's long-term vision. I also act as a bridge between the board and executive management, facilitating decision-making, accountability, and stakeholder engagement. I make this statement based on personal knowledge and if called a witness I would testify competently thereto.
2. VoteVets is a non-partisan organization incorporated under the laws of the District of Columbia. Its mission is to lift up the voices of veterans on matters of national security, veterans' care, and everyday issues that affect the lives of those who served as well as their families including foreign policy, veterans' unemployment, robust investment in care for veterans, energy security, protecting the rights of those who serve, and upholding the Constitution and democracy that every military member swore to uphold and protect. VoteVets has nearly 2 million supporters cross the country, in all 50 states, with whom it regularly communicates about issues affecting veterans, including the operations, programs, and services available through the U.S. Department of Veterans Affairs (VA). Our supporters are veterans, their family members, and other civilians who support veterans and their rights.
3. VoteVets relies on publicly available data from the VA for some of its operations, especially to identify gaps in services to veterans. When administration officials during President Trump's first term advocated for privatization of the VA, they referenced VA data showing veterans were not being seen timely for medical appointments, and they showed hiring data from the VA. We used the VA's data to advocate against privatization by showing that VA was not filling staff positions or leaving them unfilled, which was the actual cause for slower appointments and scheduling.

4. VA Secretary Doug Collins has said publicly that he plans to reduce VA staff by about 80,000 persons, rolling back staffing levels to those of 2018. In addition, I have read several media reports that the temporary Department of Government Efficiency (DOGE) and the United States Office of Personnel Management (OPM) are directing federal agencies to make staff cuts.<sup>1</sup>

5. Many veterans, including hundreds of VoteVets supporters, were recently terminated from their probationary positions at the VA. The VA has dismissed more than 2,700 probationary employees across various roles, including those in mental health research, cancer treatment, addiction recovery, prosthetics, and burn pit exposure studies. These layoffs have raised concerns about potential staffing shortages and quality of care provided to veterans.

6. The termination of probationary employees had a severe impact on VoteVets' supporters, and the impact from looming a Reduction in Force will have a far graver impact. Military veterans, many of whom have service-related disabilities, comprise about 30 percent of the federal workforce. The recent mass layoffs disproportionately affected them, leading to job losses and uncertainty. Many veterans rely on federal employment for stability, and these cuts disrupted their livelihoods.

7. In addition, the termination of tens of thousands of probationary federal employees had an adverse impact on the services provided to veterans, leading to staffing shortages, diminished support for critical programs, and increased uncertainty for veterans and their families.

8. The Veterans Crisis Line (VCL) is the VA's crisis hotline that provides emergency mental health care—including suicide prevention—and support for military veterans, service members,

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<sup>1</sup> Jory Heckman, *Lawmakers push back on VA's 'reckless' plan to cut about 80,000 positions*, FEDERAL NEWS NETWORK (March 6, 2025), available at: <https://federalnewsnetwork.com/veterans-affairs/2025/03/lawmakers-push-back-on-vas-reckless-plan-to-cut-about-80000-positions/>; *Internal VA Memo Shows 80,000 Veterans Affairs Jobs to Be Cut: Impact on Veteran Care*, MILITARY.NET (March 9, 2025), available at: <https://www.military.net/80000-veterans-affairs-jobs-to-be-cut/>; Stephen Groves, *Trump administration plans to cut 80,000 employees from Veterans Affairs, according to internal memo*, APNEWS.COM (updated March 5, 2025), available at: <https://apnews.com/article/veterans-affairs-cuts-doge-musk-trump-f587a6bc3db6a460e9c357592e165712>;

1 their families, and caregivers, and is supposed to be available 24/7. It handles tens of thousands  
2 of crisis calls each month. The VCL is extremely important in light of the high rates of post-  
3 traumatic stress disorder and suicide rates among veterans. The layoffs hindered the recruitment  
4 of essential support staff for VCL positions such as trainers and quality assurance personnel. This  
5 shortage overwhelmed existing supervisors and affected the VCL's ability to provide timely  
6 assistance to veterans in crisis.

7 9. Many of these probationary employees were reinstated after federal lawsuits. However,  
8 Secretary Collins' announcement of a reduction in force affecting as many as 80,000 of the VA's  
9 employees is very alarming because those terminations will cause problems that far exceed those  
10 caused by the probationary employees' layoffs. VoteVets and our supporters are gravely  
11 concerned that this level of staff reduction will significantly harm the quality of services provided  
12 by the VA.

13 10. The proposed staffing cuts are all the more alarming because they are coming at a time  
14 when the VA recently expanded healthcare services. The PACT Act of 2022, which VoteVets  
15 encouraged and supported, extended eligibility to thousands of new veterans who are now  
16 presumptively eligible for healthcare services. The VA has expended significant resources to  
17 advertise those benefits, and many have recently enrolled, rapidly increasing the population of  
18 beneficiaries. The proposed cuts will dramatically harm the VA's ability to continue to  
19 implement the PACT Act.

20 11. As a result, VoteVets will have to expend resources to advocate for the continued  
21 implementation of the PACT Act. This exemplifies the negative effect on VoteVets' legislative  
22 agenda, which is a multiyear process of promoting reforms that will benefit the lives of veterans  
23 and their family members. Because of layoffs, VoteVets will have to expend resources to defend  
24 benefits and services previously established and now threatened, rather than pursuing proactive  
25 legislative change.

12. A dramatic reduction in VA staff will increase the workload on remaining staff and

1 damage morale among remaining employees, causing voluntary departures. Mass layoffs will  
2 cause stress for the terminated employees as well as those who continue employment at the VA in  
3 the form of burnout, a sense of dread for the future, and depression over the reduced quality of  
4 services provided.

5 13. Research studies have shown that quality of healthcare decreases and costs increase when  
6 veterans' services are removed from the VA or channeled through other agencies. Although it  
7 may be beneficial for veterans to receive healthcare outside the VA, especially in rural and  
8 remote areas, diverting healthcare services to community care facilities will increase the burdens  
9 on those facilities. We anticipate that the proposed layoffs will cause this diversion of services,  
10 which will lower the quality of care provided for civilians and veterans.

11 14. One of the ways that VA staffing cuts have been affecting the agency's services is in the  
12 area of mental healthcare. For example, as a result of the VA's return-to-work order, mental  
13 health professionals are forced to conduct therapy in open-air cubicles, which raises privacy  
14 concerns for veterans seeking therapy. VoteVets supporters have indicated that they will never  
15 obtain therapy services from the VA again.

16 15. The proposed VA staffing cuts are also likely to roll back, damage, or destroy diversity  
17 initiatives targeted by the current administration. The nation's military is highly diverse—one  
18 study shows its military force will be composed of a majority of minority individuals by 2040—  
19 and the VA has expended significant resources to promote diversity initiatives such as specialized  
20 or individualized healthcare for specific demographics of the veteran population. For example,  
21 healthcare programs supporting Black, female, and trans veterans will be downsized.

22 16. Many VoteVets staff members are VA patients, and our staff will experience a decrease in  
23 the quality of the healthcare they receive through the VA. Additionally, because VoteVets offers  
24 health-insurance benefits to staff, the organization's operating costs will increase as those staff  
25 members decide to no longer obtain healthcare services from the VA.

17. As a result of the proposed VA staffing cuts, VoteVets is having to redirect its resources

1 to address the harms experienced by veterans receiving VA services, including longer wait times  
2 for appointments and scheduling, reduced services, and lower quality of healthcare. For example,  
3 VoteVets established an online platform designed to collect and amplify stories from veterans  
4 affected by the layoffs.

5 18. Since launching its tipline in February 16, 2025, VoteVets has received more than 200  
6 submissions from veterans and military family members negatively impacted by cuts to the  
7 federal workforce, including loss of their jobs and associated healthcare.

8 19. The terminations will also have a significant impact on the organizational activities of  
9 VoteVets. When the probationary terminations began, the time of VoteVets' staff and consultants  
10 was diverted from VoteVets' regular activities to field and respond to inquiries from veterans and  
11 their families and to connect them with case workers in congressional offices. This took almost  
12 all of our resources for weeks, and it reduced our ability to perform our regular activities to meet  
13 the needs of veterans and their families. These impacts will be far worse when the VA begins its  
14 proposed staff reduction.

15 I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and  
16 correct.

17 Executed in Key West, Florida on April 25, 2025.

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19 Major General (Ret.) Paul Eaton, USA